

EXHIBIT A

From: Pocha, Madhu <mpocha@omm.com>
Sent: Thursday, August 16, 2018 6:10 PM
To: csloane@whitecase.com; suhland@omm.com; rgordon@jenner.com; Sooknanan, Sparkle L.; Dale, Margaret A.; mbienstock@proskauer.com; JLevitan@proskauer.com; tmungovan@proskauer.com; sweise@proskauer.com; dvelawoffices@gmail.com; mhackett@proskauer.com; mroot@jenner.com; brosen@proskauer.com
Cc: Bennett, Bruce S.; Rosenblum, Benjamin; Stewart, Geoffrey S.; Sims, Ryan; afernandez@delgadofernandez.com; jcunningham@whitecase.com; de la Hoz, Fernando; jzakia@whitecase.com; Perez, Isel M.; ctheodoridis@proskauer.com; ppossinger@proskauer.com; csteerge@jenner.com; pfriedman@omm.com; emckeen@omm.com; Boone, Robbie
Subject: RE: ERS Meet and Confer

Dear Cheryl,

We are in the process of reviewing the draft stipulation that was sent earlier today by Sparkle and will get back to you soon with comments.

With respect to discovery, we can agree to the dates you propose for responses/objections to the RFAs and depositions, if they are necessary. We currently do not anticipate taking any discovery.

With respect to the supplemental briefing, we think that Movants, as the party seeking stay relief, should file first, and propose September 6 for that brief, and we will provide our response on September 10.

Please let us know if this is acceptable.

Madhu

From: Sloane, Cheryl Tedeschi
Sent: Tuesday, August 14, 2018 7:19 PM
To: Uhland, Suzanne ; rgordon@jenner.com; Sooknanan, Sparkle L. ; Dale, Margaret A. ; mbienstock@proskauer.com; JLevitan@proskauer.com; tmungovan@proskauer.com; sweise@proskauer.com; dvelawoffices@gmail.com; mhackett@proskauer.com; mroot@jenner.com; brosen@proskauer.com
Cc: Bennett, Bruce S. ; Rosenblum, Benjamin ; Stewart, Geoffrey S. ; Sims, Ryan ; afernandez@delgadofernandez.com; Cunningham, John K. ; de la Hoz, Fernando ; Zakia, Jason ; Perez, Isel M. ; ctheodoridis@proskauer.com; ppossinger@proskauer.com; Steege, Catherine L. ; Friedman, Peter ; McKeen, Elizabeth L. ; Pocha, Madhu ; Boone, Robbie ; Sloane, Cheryl Tedeschi
Subject: RE: ERS Meet and Confer

All,

To summarize today's 1:00 pm meet-and-confer call, below is our understanding of how the parties agreed to proceed over the next few days in order to comply with the Court's August 6th order. Please let us know whether you disagree with any of the following or if we've inadvertently missed anything.

- The Bondholders will circulate draft stipulated facts to the Government parties in the next day or so. This will reflect the facts set forth in the RFAs served on August 13th and any additional facts.

- The Bondholders will circulate a draft of the joint statement that includes the following:
 - Disputed facts
 - [To be determined]
 - Discovery
 - Responses/objections to RFAs served no later than August 29th
 - Depositions concluded before August 31st
 - Briefing
 - Simultaneous supplemental briefing due September 7th
- The Government parties will review the RFAs served on August 13th in the interim. The Government parties will get back to the Bondholders in the next day or so regarding (i) whether they intend to take any discovery, (ii) the extent to which the universe of facts set forth in the RFAs are disputed, and (iii) any concerns on the proposed deadlines set forth above.

Best,
Cheryl

Cheryl Sloane | Associate

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From: Uhland, Suzanne <suhland@omm.com>

Sent: Tuesday, August 14, 2018 5:16 AM

To: rgordon@jenner.com; Sooknanan, Sparkle L. <ssooknanan@jonesday.com>; Dale, Margaret A. <mdale@proskauer.com>; mbienenstock@proskauer.com; jlevitan@proskauer.com; tmungovan@proskauer.com; sweise@proskauer.com; dvelawoffices@gmail.com; mhackett@proskauer.com; mroot@jenner.com; brosen@proskauer.com

Cc: Bennett, Bruce S. <bbennett@jonesday.com>; Rosenblum, Benjamin <brosenblum@JonesDay.com>; Stewart, Geoffrey S. <gstewart@JonesDay.com>; Sims, Ryan <rsims@jonesday.com>; afernandez@delgadofernandez.com; Cunningham, John K. <jcunningham@whitecase.com>; de la Hoz, Fernando <fdelahoz@whitecase.com>; Zakia, Jason <jzakia@whitecase.com>; Sloane, Cheryl Tedeschi <csloane@whitecase.com>; Perez, Isel M. <iperez@jonesday.com>; ctheodoridis@proskauer.com; ppossinger@proskauer.com; Steege, Catherine L. <CSteege@jenner.com>; Friedman, Peter <pfriedman@omm.com>; McKeen, Elizabeth L. <emckeen@omm.com>; Pocha, Madhu <mpocha@omm.com>

Subject: RE: ERS Meet and Confer

Please include Peter Friedman, Liz McKeen and Madhu Pocha as well.

From: Gordon, Robert D. [<mailto:RGordon@jenner.com>]

Sent: Monday, August 13, 2018 7:01 PM

To: Sooknanan, Sparkle L.; Dale, Margaret A.; mbienenstock@proskauer.com; jlevitan@proskauer.com; tmungovan@proskauer.com; sweise@proskauer.com; dvelawoffices@gmail.com; Uhland, Suzanne; mhackett@proskauer.com; mroot@jenner.com; brosen@proskauer.com

Cc: Bennett, Bruce S.; Rosenblum, Benjamin; Stewart, Geoffrey S.; Sims, Ryan; afernandez@delgadofernandez.com; jcunningham@whitecase.com; fdelahoz@whitecase.com; jzakia@whitecase.com; csloane@whitecase.com; Perez, Isel M.; ctheodoridis@proskauer.com; ppossinger@proskauer.com; Steege, Catherine L.

Subject: RE: ERS Meet and Confer

Please include Cathy Steege (copied here) at Jenner on all communications on this matter. Thank you.

Robert D. Gordon